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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THERESA DANTE; TED HUSS; JULIET HINRICHES; SAMANTHA OGGS; MARGARET GATES,

Plaintiffs,

v.

JOSEPH SCHWARTZ; ROSIE SCHWARTZ; SKYLINE HEALTH CARE, LLC; SKYLINE MANAGEMENT GROUP, LLC; CORNERSTONE QUALITY CARE, LLC; COTTONWOOD HEALTHCARE, LLC; FIRST LANDING INFORMATION SERVICES, LLC; and JACK JAFFA a/k/a CHAVA JAFFA,

Defendants.

20-cv-01047 (JMV)(JBC)

**DECLARATION OF
JEFFREY I. WASSERMAN
IN SUPPORT OF MOTION
TO DISMISS AMENDED
COMPLAINT**

JEFFREY I. WASSERMAN declares the truth of the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an attorney-at-law in the State of New Jersey and the founding member of the law firm Wasserman Legal LLC, attorneys for defendant Jack Jaffa in the above-captioned action. As such, I have personal knowledge of the facts contained herein. I respectfully submit this declaration in support of Jaffa's motion

to dismiss the Amended Complaint, with prejudice, for failure to state a claim upon which relief can be granted pursuant to Federal Rules of Civil Procedure 12(b)(6).

2. For the Court's use in deciding this motion, I attach the following documents:

Exhibit 1: A true and correct copy of the Amended Complaint filed in the instant action.

Exhibit 2: A true and correct copy of this Court's July 6, 2021, decision in *In re Aurora Cannabis, Inc., Securities Litigation*, Civil Action No. 19-20588 (JMV)(JBC) [Document No. 42].

3. For the reasons set forth in the accompanying memorandum of law, I respectfully submit that Jaffa's motion to dismiss the amended complaint, with prejudice, should be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Bridgewater, New Jersey

July 30, 2021



Jeffrey I. Wasserman